

21.0 Irreversible Or Irretrievable Commitments

Section 15126(f) of the CEQA Guidelines explains that the EIR/EIR should address *"any significant irreversible environmental changes which would be involved in the proposed action should it be implemented."* In addition, Section 1502.16 of the CEQ NEPA Regulations requires that the EIR/EIS include a discussion of *"any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented."* The following considers the proposed project in light of these requirements.

The construction and operation of a new intake at Clifton Court Forebay and the four barriers would commit the construction sites to industrial-type uses. The construction sites would be committed to industrial-type uses for the life of the project, but could eventually be returned to their pre-project condition by removing the equipment and restoring the environmental resources. The restoration would return the sites to their original condition as engineered levees having natural habitat values. Accordingly, the construction of these facilities would not create irreversible environmental changes.

The construction and operation of ISDP would commit several south Delta environmental resources to managed uses for water supply purposes. This would include a 10.0 mile-long stretch of the Middle River, a 19.0 mile stretch of Old River from the Delta-Mendota Canal to the confluence of Old River and the San Joaquin River, and an 8.0 mile long stretch of Grant Line Canal, from Old River to the Holly Sugar Factory also at Old River. These reaches would be managed as a component of ISDP by the construction and operation of four barriers. These barriers would be designed to maintain higher than normal water levels during specified periods of the year. They would include facilities to enable boats to pass and gain access to these reaches, but the ease of navigation/access through these areas would be diminished. The construction and operation of the barriers would commit these reaches to managed uses for the life of the project, but the reaches could eventually be returned to their pre-project condition by removing the barriers. Accordingly, the construction and operation of the barriers would not create irreversible environmental changes.

The dredging of Old River would deepen the existing channel by five feet. This deepening would be irreversible, but would not be considered a significant environmental change. Placement of dredged materials in settling ponds on Victoria Island would result in the conversion of approximately 614 acres of prime agricultural land to non-agricultural uses; however, as the land is expected to eventually be returned to agricultural production, this would not constitute an irreversible commitment of agricultural resources.

The irretrievable commitment of some nonrenewable natural resources would occur as a result of the proposed ISDP. Initially, these resources would be committed for use in construction phases, including use of materials for construction and energy resources used for operation of equipment during the construction of proposed facilities. The use of materials and energy resources during construction would not constitute a significant commitment of resources.

Over the life of the project, energy resources would continue to be used for operation of the barriers and intake, and to supply power for the pumping of water to SWP service areas. However, this commitment is not considered to be a substantial change from existing energy expenditures associated with SWP pumping.